



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 2, 2021

By Email and USAF×

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Re: United States v. Michael McMahon
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional discovery in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
China Daily webpage	MM-002403	MM-002403
SMS and MMS messages	MM-002404	MM-002420
Citibank records	MM-002421	MM-002625
Discover Bank records	MM-002626	MM-003011

Description	Begin Bates	End Bates
Discover Bank records	MM-003012	MM-003114
Equifax records	MM-003115	MM-003124
GTA records	MM-003125	MM-003218
Guam Department of Revenue and Taxation records	MM-003219	MM-003225
Items shown to Michael McMahon on October 28, 2020	MM-003226	MM-003253
JP Morgan Chase & Co. records	MM-003254	MM-003866
JP Morgan Chase & Co. records	MM-003867	MM-004101
Lycamobile records	MM-004102	MM-004102
New York State Department of Motor Vehicle records	MM-004103	MM-004127
Pinger records	MM-004128	MM-004131
Law enforcement records associated with Michael McMahon	MM-004142	MM-004148
Electronic Messages and Draft Translation	MM-004149	MM-004165
uShip records	MM-004166	MM-004191 & MM-004246
FBI Laboratory Report	MM-004192	MM-004198
FBI Laboratory Report	MM-004199	MM-004204
Facebook records	MM-004205	MM-004208

Description	Begin Bates	End Bates
Electronic Messages and Draft Translation	MM-004209	MM-004209
Electronic Messages and Draft Translation	MM-004210	MM-004210
Electronic Messages and Draft Translation	MM-004211	MM-004211
Electronic Messages and Draft Translation	MM-004212	MM-004212
Electronic Messages and Draft Translation	MM-004213	MM-004213
Electronic Messages and Draft Translation	MM-004214	MM-004214
Electronic Messages and Draft Translation	MM-004215	MM-004215
Yahoo! records	MM-004216	MM-004216
Yahoo! records	MM-004217	MM-004217
Apple records	MM-004218	MM-004218
Google records	MM-004219	MM-004219
T-Mobile records	MM-004220	MM-004220
Electronic communications associated with Michael McMahon	MM-004221	MM-004221
Apple records	MM-004222	MM-004225
Capital One Bank records	MM-004226	MM-004226
AT&T records and data	MM-004227	MM-004227

Description	Begin Bates	End Bates
eBay records	MM-004228	MM-004228
Paypal records	MM-004229	MM-004229
Google records	MM-004230	MM-004230
Google records	MM-004231	MM-004231
Lycamobile records	MM-004232	MM-004232
Microsoft records	MM-004233	MM-004233
Scottrade records	MM-004234	MM-004234
T-Mobile records	MM-004235	MM-004235
T-Mobile records	MM-004236	MM-004236
T-Mobile records	MM-004237	MM-004237
Photographs and video	MM-004238	MM-004238
Yahoo records	MM-004239	MM-004239
Yahoo records	MM-004240	MM-004240
T-Mobile records	MM-004241	MM-004242
T-Mobile records	MM-004242	MM-004243
Verizon records	MM-004243	MM-004244

Description	Begin Bates	End Bates
Audio recording	MM-004245	MM-004245

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers certain of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9.”). The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

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Enclosures (via USAFEx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)